

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	Chapter 11
	)	
	)	
THE WORTH COLLECTION, LTD.,	)	Case No. 20-10337 (BLS)
	)	
	)	
Debtor.	)	Related to D.I. 89, 93, 95

**SECOND SUPPLEMENTAL DECLARATION OF HARLEY J. GOLDSTEIN IN  
SUPPORT OF THE TRUSTEE’S APPLICATION FOR AUTHORITY TO EMPLOY  
AND RETAIN GOLDSTEIN & MCCLINTOCK LLLP AS COUNSEL  
NUNC PRO TUNC TO JUNE 23, 2021**

I, Harley J. Goldstein, being duly sworn, state the following under the penalty of perjury:

1. On July 14, 2021, Douglas T. Tabachnik, the chapter 7 trustee appointed to administer the above-captioned bankruptcy case (the “Trustee”), filed his *Application for Authority to Employ and Retain Goldstein & McClintock LLLP as Counsel for the Chapter 7 Trustee, Nunc Pro Tunc to June 23, 2021* [Docket No. 89] (the “Application”).<sup>1</sup> On July 30, 2021, this Court entered an order authorizing the Trustee to employ and retain G&M as his counsel, *nunc pro tunc* to June 23, 2021 [Docket No. 93] (the “Retention Order”).

2. Pursuant to Bankruptcy Rule 2014, I executed a declaration (the “Retention Declaration”) in support of G&M’s retention, which was concurrently filed with the Application. See Docket No. 89-2. On August 3, 2021, I submitted a supplemental declaration (the “First Supplemental Declaration”) to amend the Retention Declaration, so as to disclose an additional matter that G&M had been asked to serve as co-counsel with the Trustee’s law firm representing common clients in certain litigation wholly unrelated to the parties in interest and the subject of this Chapter 7 Case. See Docket No. 95.

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<sup>1</sup> All capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Application.

3. Pursuant to Rule 2014 of the Federal Rules of Bankruptcy Procedure and Rule 2014-1 of the Local Rules of the Bankruptcy Court for the District of Delaware, I hereby submit this second supplemental declaration (this “*Second Supplemental Declaration*”) to amend the Retention Declaration, so as to disclose an additional matter that G&M has been asked to serve as co-counsel with the Trustee’s law firm representing a common client in an additional matter (the “*Additional Engagement*”) wholly unrelated to the parties in interest and the subject of this Chapter 7 Case – *i.e.*, the representation of Saint Mark’s Funding, LLC in the bankruptcy case captioned *In re Colleen Evelyn Carter-Neblett*, Case No. 20-71692-PMB (pending in U.S. Bankruptcy Court for the Northern District of Georgia). As with the previously-disclosed matters, the Additional Engagement is wholly unrelated to the parties in interest and the subject of this Chapter 7 Case.

4. I file this Second Supplemental Declaration out of an abundance of caution to disclose the Additional Engagement. I do not believe the Additional Engagement alters G&M’s status as a “disinterested person” (as that term is used in 11 U.S.C. § 101(13)) with respect to this Chapter 7 Case.

Under 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 11, 2022

/s/ Harley J. Goldstein  
Harley J. Goldstein